

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

JUL - 6 2022

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
JAMES BOND,)
)
Defendant.)

No. 4:22-cr-00375-JAR/DDN

MOTION FOR PRETRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and William Scharf, Assistant United States Attorney for said District, and moves the Court to order Defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of Defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3141, et seq.

As and for its grounds, the Government states as follows:

1. Defendant is charged with possession with intent to distribute methamphetamine, in violation of 21 U.S.C. § 841(a)(1), possession of a firearm in furtherance of a drug trafficking crime, in violation of 18 U.S.C. § 924(c), and felon in possession of a firearm, in violation of 18 U.S.C. § 922(g)(1). In light of the charges against him, a presumption of detention applies in this case.

2. According to information received from the St. Louis County Police Department, Defendant was the driver and sole occupant in a vehicle crash on January 23, 2022. When officers attempted to convince him to receive medical aid from paramedics who responded to the scene, Defendant ended up becoming belligerent, struggling with the officers and paramedics. As one officer examined the damage to Defendant's vehicle from the crash, he found a clear plastic bag

containing a large number of colored pills in plain view. A search of the vehicle that followed uncovered more pills and a black semiautomatic handgun. In total, 470 pills were recovered, and laboratory analysis confirmed that they contained methamphetamine. The handgun was later identified as a Glock 27 .40 caliber semiautomatic handgun loaded with 21 live rounds of ammunition in an extended magazine.

3. Defendant has an extensive criminal history, including a conviction in this Court for being a Felon in Possession of a Firearm, for which he was sentenced to 72 months' imprisonment in 2014, as well as two prior Unlawful Possession of a Firearm convictions, a conviction for Domestic Assault 2nd, and a conviction for Unlawful Use of a Weapon, all in Missouri state courts.

4. There is a serious risk that Defendant will be unable to abide by any conditions of supervision, as his record reveals at least one suspended sentence being revoked for a period of incarceration.

5. Similarly, there is a serious risk that Defendant will flee, in light of the heavy sentence he faces in this case. As a result, there are no conditions or combination of conditions that will reasonably assure Defendant's appearance as required.

6. Furthermore, Defendant's criminal history and the nature and circumstances of the offense charged reflect that there is a serious danger to the community that would be posed by Defendant's release. Specifically, Defendant has repeatedly re-armed himself despite repeatedly being convicted for firearms offenses.

WHEREFORE, there are no conditions or combination of conditions that will reasonably assure defendant's appearance as required, and that will protect the safety of other persons and the

community, and the Government therefore requests this Court to order Defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of Defendant's initial appearance.

Respectfully submitted,

SAYLER A. FLEMING
United States Attorney

/s/ William Scharf
WILLIAM SCHARF, #66676MO
Assistant United States Attorney